

Privacy Policy

Version 3.0 effective on 18 January 2018

Kiron.ngo is a collection of free services by

Kiron Open Higher Education gGmbH (haftungsbeschränkt)
Am Festungsgraben 1
10117 Berlin, Germany

hereinafter: "Kiron" or "We".

Kiron allows you to:

- access its public content (A.), where we also do some analytics
- Apply and register as a member of our community (B.)
- register for our newsletter (C.)

Data Privacy is an important topic for us and we hold the protection of your personal data in very high esteem. We comply with the provisions of the German Federal Data Protection Act and the German Telemedia Act as well as with applicable EU privacy regulations.

Depending on your use of the our services different sets of data may be stored, as is described in detail below.

- I. Accessing content at Kiron.ngo
- II. Kiron newsletter
- III. Being a Kiron student
 - Application
 - Completion of the Onboarding
 - Eligibility – Motivation
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Kiron uses service providers in order to operate and maintain the Kiron platform. The service providers will process the data exclusively in accordance with the instructions of Kiron and have been obliged to comply with the applicable data protection regulations. Kiron and its assigned service providers will take reasonable technical and organizational precautions in order to protect the data of the users.

Here is an overview of the different services at Kiron where personal data may be processed.

I. Accessing content at Kiron.ngo

Web analytics via Google Analytics

We use Google Analytics, including the functionalities of Universal Analytics, a web analytics service provided by Google, Inc. ("Google"). Universal Analytics allows us to track usage on several devices (such as computer, tablet, smartphone). This is done by automatically assigning a pseudonym user-ID of the user. No personal identifiable information is passed to Google. Google Analytics also uses the cookies (detailed below), which are text files placed on your computer, to help the website analyze how users use the site. The information generated by the cookie about your use of the website will be transmitted to and stored by Google on servers in the United States. IP anonymization is activated on this website: your IP address will be truncated within the area of Member States of the European Union or other parties to the Agreement on the European Economic Area. Only in exceptional cases will the whole IP address be first transferred to a Google server in the USA and truncated there. The IP anonymization is activated on these websites.

Google will use this information on behalf of Kiron for the purpose of evaluating your use of the website, compiling reports on website activity and providing other services relating to website activity and internet usage to Kiron.

You may refuse the use of cookies by selecting the corresponding settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. You can also opt-out from being tracked by Google Analytics with effect for the future by downloading and installing Google Analytics opt-out browser add-on for your current web browser: <http://tools.google.com/dlpage/gaoptout?hl=en><http://tools.google.com/dlpage/gaoptout?hl=en> . You may also configure your browser in a way that permanently prevents it from transmitting any data to Google servers (e.g. by installing add-ons like NoScript or Ghostery for Firefox).

As an alternative to the browser add-on or for browsers on mobile devices, you can click this link in order to opt-out from being tracked by Google Analytics on this website in the future (the opt-out applies only for the browser in which you set it and for web pages under this domain). An opt-out cookie will be stored on your device, which means that you'll have to click this link again, if you delete your cookies.

Social Plugins

Kiron may also use social plugins from the services listed below. Please refer to the respective privacy policies for more information:

- Facebook Like Button: https://de-de.facebook.com/full_data_use_policy by Facebook Inc., 1601 S. California Avenue, Palo Alto, CA 94304, USA
- Google Plus: <http://www.google.de/intl/de/policies/privacy/> by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA
- Twitter Tweets: <http://twitter.com/privacy> by Twitter Inc., 1355 Market St, Suite 900, San Francisco, CA 94103, USA
- Instagram integration, <https://help.instagram.com/155833707900388>, by Instagram LLC, 1601 Willow Rd, Menlo Park CA 94025, USA
- LinkedIn Share Button, <https://www.linkedin.com/legal/privacy-policy> by LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland

Most of those services will not be contacted unless you specifically click on the respective buttons, but they may also establish a direct connection, which will allow the services to combine the information that you are accessing our service with your account information, if you are logged in to the respective service. Upon clicking the respective logo, the information will then be made publicly available, according to the specific policies of the service as well as your preferences within that service.

Other external services

We may use a number of other external services embedded in our website to better display certain content or deliver additional services. Below is a list of services and their respective privacy policies:

- Maps and Fonts via Google: <http://www.google.de/intl/de/policies/privacy/> by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA
- Fonts via FontAwesome: <https://fontawesome.com/privacy>
- Donations via Betterplace: <https://www.betterplace.org/c/privacy-policy> by gut.org gemeinnützige Aktiengesellschaft, Schlesische Straße 26, 10997 Berlin, Germany.
- Videos via Youtube: <https://www.google.de/intl/de/policies/privacy>
- Videos via Vimeo: <https://vimeo.com/privacy>

Cookies

In order to optimize our services, we use cookies on different pages of the Kiron platform. Cookies are small text files that are stored on your device. Some of the cookies will be deleted at the end of your browser session (so-called session cookies). Other cookies may remain on your device and allow us to identify your browser the next time you visit the Kiron platform (so-called persistent cookies).

You can set your browser so that it enables you to decide in each case whether or not to accept or reject all cookies or specific cookies being installed by a webpage. In case of non-acceptance of cookies, the functionality of the Kiron platform may be limited.

Links

Our website contains links to other websites. Please note that when you click on one of these links you are entering another website, for which Kiron is not responsible.

II. Kiron newsletter

Via our website you can also register for our Newsletter. In this case, you will have to consent to the following:

You are giving your consent to processing your email address for the purpose of sending a Newsletter with information about Kiron. We will not transfer the email address we have received for newsletters to any third party, except for the purpose of sending out the newsletter, where we may work with a specialised provider contracted by us:

Mailjet SAS
Contact: 13-13 bis, rue de l'Aubrac – 75012 Paris, France
https://www.mailjet.com/privacy_policy

You can, of course, unsubscribe from the newsletter at any time via email privacy@kiron.ngo, or better by following the instructions provided at the bottom of each newsletter. After unsubscribing, your email address will be removed from the system handling the newsletter.

III. Being a Kiron student

Should you be interested in applying and registering to become a Kiron Student, you will have to agree to the following data processing taking place as part of the service.

Application

In order to register as a Kiron Student, you must successfully apply first.

- First, we collect a set of information to prepare the registration, which will be later used as a Kiron student.

The application process meets also two more goals:

- To ensure that you are eligible for our free service, by providing some proof of your status as a “refugee”, as an internally displaced person or as a qualifying member of a host community in focus countries.
- To ensure that you meet our eligibility criteria as a Kiron student, according to your qualifications and motivation.
- To help identify the specific Student Services which will be offered to you upon successful registration.

Preparing the registration

The following pieces of data are collected and used to create your student account as an applicant:

- first name
- last name
- email
- gender
- country
- city

- date of birth
- nationality
- phone number
- desired study program
- refugee status
- UNHCR number (optional)
- languages
- country you went to school in (optional)
- your education level (optional)
- your previous educational degrees (optional)
- school documents (optional)
- whether you took the Tawijhi test or not (optional)
- whether you previously attended university or not (optional)
- which country you have attended university in (optional)
- which level you attended university at (optional)
- how many semesters you have previously studied at university (optional)
- whether you are currently enrolled in university or not. (optional)
- how you heard about Kiron (optional)
- short text on what your goals for studying at Kiron are

Refugee status

Kiron's student services are targeted primarily at refugees in the focus countries. In addition, we accept internally displaced people and eligible members of host communities in Jordan and Lebanon. We must therefore assess your eligibility.

The respective documents uploaded by you are stored separately from your account information.

Completion of the Onboarding

Once successfully registering at Kiron, you will have to complete a series of steps, collectively "onboarding", in order to gain access to certain Student Services. Non-completion of these steps may lead to a deactivation or blocking of your account.

Eligibility - Motivation

Eligibility to participate in Kiron requires filling out a form describing your motivation for becoming a Kiron student. After approving the application the data collected on your motivation is only used for scientific purposes and to further improve the service.

Registration and login via an account in Google's G Suite

When your application is successful you will be provided an email account with an address having two letters, representing the first initial of your first and last names, and a number. For instance, the name "your name" could be used to assign an email address such as "yn123@student.kiron.ngo". This account will be maintained by Google Inc., and administered by us as part of their Google-for-Nonprofits programme.

The data is transferred to Google Inc., under an agreement, which includes the standard-clauses predefined by the European Commission, as a possible legal basis for such transferal.

To use our service you will need to agree to Google's terms of service (<https://www.google.com/intl/en/policies/terms/>) and privacy policy (<https://www.google.com/policies/privacy/>).

Effectively, the account entails a number of functions, which are part of the G Suite. A core functionality, besides Email, is the use of the login-mechanism, i.e. you will need to login via this account, when wanting to access our services.

For further information see:

<https://apps.google.com/faq/security/> and
<https://cloud.google.com/security/whitepaper>

Student Services

As a Kiron student you are given access to a number of services and functionalities of the platform, for which personal data needs to be collected. Specifically:

- to provide recommendations for online courses
- to transfer and provide access to MOOC-platforms such as edX and Coursera
- to provide further information about our products and recent developments at Kiron
- to deliver a possibility for exchange through our forum
- to invite you to Student Events
- to help you with transfer to a university
- To provide you with Mentoring services
- To provide you with "Direct Academics" tutorials and classes

Kiron may collect, process and use the content and other information users provide when using the services, including the data submitted for signing up for a service, creating or sharing content, and messaging or communicating with others on the website. Such information may include:

- first name
- last name
- email
- gender
- country
- city
- date of birth
- nationality
- phone number
- etc.

Recommendation of courses

Kiron aims at providing an overview and specific recommendations for free online courses (Massively Open Online Courses, MOOCs), which fit your interests. Such recommendations may be selected by taking into account data Kiron has collected about you.

Our MOOC Partners

Kiron will allow you to get access to different free online courses, which are governed by their own separate privacy policies and terms of services. You can find a complete list of third party MOOC-Partners and their Privacy Policies and Terms of Services [here](#).

Usually access to these services is granted via your Google-apps login with your xyz@students.kiron.ngo account. You must login to the MOOC partners websites with your kiron students account in order to gain access.

Transferal of Data from our partners

Furthermore, Kiron may receive information about the users and their activities (e.g. participation and completion of courses and programs) on and off the service from third-party partners, such as information from a MOOC-partners on the choice of subject, study record, period of study, results of completion.

Additional Information via phone, email and other means

Kiron may send you updated information via email or other messaging services for which the respective contact details are used.

These services include:

- WhatsApp: for certain services we may also ask you to communicate through WhatsApp Messenger service (<https://www.whatsapp.com/legal/#privacy-policy>)
- Mailjet: used for delivering emails to students and people who signed up to receive mailings from Kiron (https://www.mailjet.com/privacy_policy)
- MessageBird: to deliver SMS messages to students. (<https://www.messagebird.com/en/privacy>)
- Google Hangouts: may be used for phone conversations with students and video calls within Kiron-organized group tutorial sessions (<https://www.google.com/+/policy/call-phones-terms.html>)
- Calendly: For a few services you may be asked to use the service offered by Calendly for scheduling meeting times (<https://calendly.com/pages/privacy/>)
- Facebook Groups: May be used for recruiting purposes and for the organisation of student events. ([https://www.facebook.com/legal/FB Work Privacy](https://www.facebook.com/legal/FB_Work_Privacy))

Such messages may include information about our products and recent developments. We may also contact you in case of questions in connection with the Kiron platform, as well as to inform you on changes with regard to this Data Privacy Policy or any other Terms of Services.

Other disclosures

Other than in the aforementioned cases Kiron will not transmit your personal data to any third parties, unless we are obliged to do so because of German legal regulations (e.g. disclosure to courts or law enforcement authorities), you have given us your explicit consent, or the disclosure is permitted by law. A disclosure may for example be permitted when such disclosure is required for us to be able to render our services to the user on the Kiron platform (e.g. see above: transfer of personal data to our MOOC-partners).

Forum based on Discourse Software (optional)

Kiron also offers access to a forum based on the discourse platform to exchange your experience with other students or with members of the team at Kiron.

The forums moderators may remove content at the discretion of Kiron (and in regard with the forums code of conduct). Using the forum is optional, but you need to be aware that content you provide within the forum may be accessed by a larger audience. The forum is not accessible by external search engines, such as Google or Bing. The forum is only accessible via login with an email address granted by Kiron.

Location Data

Kiron will provide specific offers based on the country or city you are currently located in. Kiron needs to know in which country you are currently located in order to offer these services. Additionally, you may provide your current city in order to further allow for tailoring of services. We make use of the Google Location API when you enter your location. You can find the Google API privacy policy here: <https://www.google.com/policies/privacy/>

Student Events

Kiron periodically organizes events for its students and may collect specific information to facilitate the organisation of such events. The participation in such events is optional and the information provided by you is used only for the organisation of the specific event. Kiron may keep a record of which students participated at student events.

Language Courses

Kiron offers (optional) language courses and works with partners to provide you with language learning opportunities. Language partners may ask you for personal information on their website and Kiron may receive and store some info about your participation, about your language test results, etc. from the partners.

Transfer to University

For connecting students to partner universities, we may need to communicate with universities using your name and application number.

With your consent we may help you submit your application at a university and therefore transfer your personal information to the university. We will not disclose any information which you have not given explicit permission.

Mentoring

Online mentoring is provided in partnership with Volunteer Vision (<https://www.volunteer-vision.com>). You will create a separate user account on the partners website. These partners may share data about your participation in their programs with Kiron.

Counseling

Online mentoring is provided in partnership with IPSO (<https://ipsocontext.org>). You will create a separate user account on the partners website. These partners may share data about your participation in their programs with Kiron.

Certificate of Enrollment

Kiron may provide you with a non-legally binding document which says that you are enrolled at Kiron. We may ask you about the purpose of the request and will use this information for statistics and to help us identify potential transfer students.

IV. Storage & processing of data

Amazon Web Services (AWS)

All Kiron servers and data storages are hosted at AWS and are located within the European Union.

Contact: Amazon Web Services, Inc., P.O. Box 81226, Seattle, WA 98108-1226

Amazon Web Services is compliant within EU-U.S. and Swiss-U.S. Privacy Shield Frameworks and the upcoming European GDPR regulations. AWS has obtained approval from EU data protection authorities, known as the Article 29 Working Party, of the AWS Data Processing Addendum. More information:

<https://aws.amazon.com/compliance/eu-data-protection/>

LiveAgent

Our Student communications, Support Ticketing system, Support Portal and knowledge base, Feedback and suggestions section are using a software solution by LiveAgent. Data including email contact information, IP-address logs as well as email content is stored on servers hosted by LiveAgent.

Contact: Quality Unit, LLC, 3616 Kirkwood Highway, Suite A #1130, Wilmington DE 19808

All servers by LiveAgent are hosted in the European Union are compliant with European data protection regulations. LiveAgent and its parent company QualityUnit are currently strengthening their privacy protocols to comply with EU GDPR.

More information: <https://www.ladesk.com/security-privacy-policy/>

HubSpot

We use the CRM software solution provided by Hubspot, Inc, and Hubspot may store contact and correspondence information of external parties Kiron interacts with on their servers. This does not include personal information of our students.

Contact: HubSpot, Inc., European Headquarters, One Dockland Central, Dublin 1, Ireland

HubSpot complies with the EU-U.S. Privacy Shield Principles for all onward transfers of personal data from the EU. More information: <https://legal.hubspot.com/privacy-policy/>

IT Security

For the purpose of handling security incidents and to help diagnosing problems with our servers, we automatically store log files of the data which your browser sends when visiting the page. Additionally we collect diagnostic data which may include personally identifiable information, such as:

- Name (as you enter it to a form on our website)
- Email address (which you use to Login or enter on our website)
- Username (which you use on our website)
- Mobile Device ID (of your mobile device)
- IP Address (the number that is automatically assigned to your computer when you use the Internet)
- Browser type and -version

- Operating System
- Referrer URL (the page, from which this page was linked, including the search term, in case of a search engine)
- Time and date of the request.

V. Data analysis for scientific purposes

Kiron may analyze the data collected for scientific purposes in order to conduct academic surveys and research, such as evaluating key performance indicators, social impact and scientifically analyze the services. Such research will be conducted by Kiron or its research partners either in accordance with the respective legislation, using anonymized and pseudonymised data, whenever possible, or after you have explicitly consented to be part of such research.

VI. Termination of membership

You may terminate your membership with the Kiron platform at any time. For this purpose please send an email to student-support@kiron.ngo. Accounts may get disabled or deleted if we detect inactivity for an extended period of time and only if repeated notification emails remain unanswered.

- Your account will be removed from our platform and live systems within maximum 5 working days.
- Data related to your account may remain in our backup systems for a period of time but will be irreversibly deleted after 12 months at the latest.
- When terminating your membership, all your personal data and references to you will be completely anonymized with the exception of the data, for which a statutory permission to retain exists.
- Your profile in our forum (<https://forum.kiron.ngo>) will be anonymized. Any content you contributed to the forum, however, will remain.
- Upon account deletion - either by students' request or upon extended inactivity - the Google Account provided by Kiron (email address ending in @students.kiron.ngo) including the Gmail email box and the Drive cloud storage will be closed and all information will be deleted from Google's and Kiron's servers. The data cannot be recovered once it is deleted.

VII. Right to information, questions, suggestions and comments

You have the right to be informed about your personal data stored in connection with the Kiron platform free of charge.

If you have any such or other queries concerning the processing of your personal data you may send us your query via email to privacy@kiron.ngo or via mail to:
Kiron Open Higher Education gGmbH (haftungsbeschränkt), Am Festungsgraben 1,
10117 Berlin, Germany

VIII. Versions, modification of this privacy policy

We may modify this Policy from time to time and adjust it according to the underlying data processing. When we make changes to this Policy we will inform users on our website, via app and via email.

This is the third version of this policy: Version 3.0 (effective January 18th 2018).

Previous versions:

Version 2.1 (effective from October 13th 2016 to January 17th 2018) can be found [here](#).

Version 2.0 (effective from 1st July to 12th October 2016) can be found [here](#).

Version 1.2 (effective from 11th May to 30th June 2016) can be found [here](#).

Version 1.1 (effective from 16th March to 10th May 2016) can be found [here](#).

Version 1.0 (effective from 15th October 2015 to 15th March 2016) can be found [here](#).